

MISSOURI STATE CONFERENCE OF )  
THE NATIONAL ASSOCIATION FOR THE )  
ADVANCEMENT OF COLORED PEOPLE, )  
REDDITT HUDSON, F. WILLIS JOHNSON )  
and DORIS BAILEY, )  
 )  
 ) Civ. No. 14-2077  
Plaintiffs, )  
v. )  
 )  
FERGUSON-FLORISSANT SCHOOL )  
DISTRICT and ST. LOUIS COUNTY BOARD )  
OF ELECTION COMMISSIONERS, )  
 )  
 )  
Defendants. )

This Defendant (hereafter the “Election Board”) does not support or oppose Plaintiffs’ Request but wishes to inform the Court of the timing and practical effects when determining such relief, either on an interim basis or as a final order.

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February 23, 2016. That is the prescribed statutory date for candidate filing pursuant to Section 115.127 RSMo.

4. Preparation for a November 8, 2016 election date would be feasible if a new district map is available by July 5, 2016.
5. The Election Board will attempt to follow any schedule established by the Court, but practical issues may make preparation for certain election dates impossible.

For the reasons above the Election Board requests the Court consider these statutory and practical guidelines before issuing any order regarding cancellation or changing the date of the April 5, 2016 election.

Respectfully submitted,

CROTZER & ORMSBY, LLC

/s/ Darold E. Crotzer, Jr.

Darold E. Crotzer, Jr., #19434MO  
130 S. Bemiston Ave., Suite 602  
Clayton, MO 63105  
314.726.3040 / 314.726.5120 (fax)

*Attorney for Defendant St. Louis County  
Board of Election Commissioners*

**CERTIFICATE OF SERVICE**

On December 10, 2015, a copy of the foregoing was electronically filed with the Clerk of the Court using the e-filing system, an electronic copy therefore being served on Anthony E. Rothert, Grant R. Doty, Andrew J. McNulty, Gillian R. Wilcox, Dale E. Ho, Julie A. Ebenstein, and M. Laughlin McDonald, Attorneys for Plaintiffs.

/s/ Darold E. Crotzer, Jr.